

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ZAN SUN and QING LING CHENG,

Plaintiffs,

v.

**SHEN YUN PERFORMING ARTS, INC.,
FEI TIAN COLLEGE, FEI TIAN
ACADEMY OF THE ARTS, DRAGON
SPRINGS BUDDHIST INC., HONGZHI LI,
and RUI LEE,**

Defendants.

Case No.: 25-cv-3185

AMENDED COMPLAINT

DEMAND FOR A JURY TRIAL

Through their attorneys, Zan Sun (“Plaintiff Sun” or “Sun”) and Qing Ling Cheng (“Plaintiff Cheng” or “Cheng,” and together with Sun, “Plaintiffs”) allege as follows against Shen Yun Performing Arts, Inc. (“Shen Yun”), Fei Tian College (“College”), Fei Tian Academy of the Arts (“Academy”), Dragon Springs Buddhist Inc. (“Dragon Springs”), Hongzhi Li (“Hongzhi Li”), and Rui Lee (“Rui Lee”) (collectively, “Defendants”):

NATURE OF THE ACTION

1. Shen Yun, the global dance and music company whose colorful posters can be found on streets and subways in nearly every major city, has amassed a sizeable fortune and a world-renowned reputation for dazzling stage shows. Underlying this success, however, is an army of forced child laborers enduring brutal conditions under the command of Shen Yun’s founder, Hongzhi Li.

2. Some as young as 11 years old, these children are plucked from families of Falun Gong practitioners around the world who abide Hongzhi Li’s exhortations about preserving “true”

Chinese culture before the stain of Communism. The children are turned over to Hongzhi Li, and Defendants work together to confine them to Dragon Springs, a secluded compound in Cuddebackville, New York. Dragon Springs is surrounded by armed guards, high fences, German shepherds, and, allegedly, bears. Once locked in, the child laborers cannot leave, and so begins Defendants' physical and psychological control campaign that ultimately destroys in the child laborers any sense of reality or autonomy.

3. The child laborers suffer a dreadful existence at Dragon Springs. The Academy and the College enforce a grueling training schedule that runs 15 hours each day at least six days a week. There are no sick days and medical care is forbidden. Defendants implement this first phase of the forced labor scheme with merciless efficiency, tolerating no resistance and demanding total conformity among the child laborers. Defendants' employees report to Hongzhi Li, who—with the assistance of Rui Lee—is the ultimate decision-maker and disciplinarian for all matters at the Academy and the College.

4. The second phase of the forced labor scheme takes place around the world on the Shen Yun tour. If Dragon Springs is the penal colony, the Shen Yun tour is a chain gang. Sorted by Hongzhi Li into groups based on height and appearance, the child laborers are deployed as dancers or musicians on a crushing tour schedule, going from city to city, working for up to fifteen hours each day with no respite. For this, the child laborers were paid generally no more than \$500 a month—less than the price of a pair of orchestra seats at this year's Lincoln Center performance.

5. Plaintiffs were two child laborers recruited into Defendants' forced labor scheme at ages 13 and 15. Plaintiffs endured endless working hours, serious injuries without medical care, isolation from their families, and threats of death, humiliation, and physical and psychological harm. Plaintiffs performed at several hundred shows in hundreds of cities around the world.

6. Hongzhi Li is the mastermind of the entire forced labor scheme, and each Defendant worked with him to execute it at every turn, whether by recruiting, harboring, transporting, providing, or obtaining Plaintiffs' labor. Defendants also perpetuated the belief that, if Plaintiffs did not perform perfectly or otherwise follow Hongzhi Li's every command, they would suffer serious harm. Defendants confiscated and possessed Plaintiffs' passports so they could not leave, and knowingly benefited from their participation in the scheme. As alleged below, all of these acts violate multiple provisions of the Trafficking Victims Protection Reauthorization Act, 18 U.S.C. §§ 1581 *et seq* ("TVPRA"), and accordingly, Plaintiffs seek damages.

JURISDICTION AND VENUE

7. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 because this civil action seeks to enforce rights and remedies for violations of the TVPRA.

8. Venue is proper in the Southern District of New York pursuant to 28 U.S.C. § 1391(b)(1) because Defendants reside in the Southern District of New York.

9. Venue is proper in the Southern District of New York pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the claims occurred in the Southern District of New York.

PARTIES

10. Plaintiff Sun is an adult citizen and resident of New Zealand.

11. Plaintiff Cheng is an adult citizen and resident of New Zealand.

12. Plaintiff Sun and Plaintiff Cheng are married.

13. Defendant Shen Yun Performing Arts, Inc. ("Shen Yun") is a nonprofit organization incorporated in New York and located at 140 Galley Hill Road, Cuddebackville, NY 12729.

14. Defendant Fei Tian College (the “College”) is a nonprofit school at 140 Galley Hill Road, Cuddebackville, NY 12729.

15. Defendant Fei Tian Academy of the Arts (the “Academy”) is a nonprofit school located at 140 Galley Hill Road, Cuddebackville, NY 12729.

16. Defendant Dragon Springs Buddhist Inc. (“Dragon Springs”) is a nonprofit organization incorporated in New York and located at 140 Galley Hill Road, Cuddebackville, NY 12729.

17. Defendant Hongzhi Li is an adult resident of Cuddebackville, New York. Also known as “D.F.,” he is the founder and leader of Shen Yun, the College, the Academy, Dragon Springs, and the Falun Gong political movement also known as Falun Dafa (“Falun Gong”). The child laborers refer to Hongzhi Li as “master.”

18. At all relevant times, Hongzhi Li was Shen Yun’s director, leader, employee, representative, and/or agent acting to further its financial interests.

19. Defendant Rui Lee is an adult resident of Cuddebackville, New York and married to Hongzhi Li. Together with Hongzhi Li, she manages and is closely involved in the day-to-day operations of Shen Yun, the College, the Academy, and Dragon Springs. She directs all Shen Yun tour managers and is also an administrator at the Academy. From 2008 to 2013, Rui Lee was Shen Yun’s Chief Financial Officer. The child laborers refer to Rui Lee as “master’s wife.”

20. At all relevant times, Shen Yun, the College, the Academy, and Dragon Springs were alter egos for Hongzhi Li and Rui Lee. None of the Defendants observed corporate formalities. On information and belief, Hongzhi Li and Rui Lee commingled their personal assets with the corporate assets of Shen Yun, the College, the Academy, and Dragon Springs.

21. At all relevant times, Hongzhi Li and Rui Lee acted as agents and/or employees of the other Defendants, within the time and space limits of their agency relationship with the other Defendants. The actions of Hongzhi Li and Rui Lee alleged herein were typical of their roles as employees, such that the other Defendants could have reasonably anticipated them. Defendants Shen Yun, College, Academy, and Dragon Springs committed their acts and omissions through their agents.

THE SHEN YUN FORCED LABOR SCHEME

The Forced Labor Scheme is Controlled by Hongzhi Li

22. In 2006, Hongzhi Li founded Shen Yun, a performing arts and entertainment company. Relying on the forced labor of hundreds of children, a network of employees, and his wife Rui Lee, Hongzhi Li perpetuates a forced labor scheme through hundreds of Shen Yun performances each year across the United States and around the world.

23. Hongzhi Li controls, directs, and manages Shen Yun. He hand-selects Shen Yun's employees, administrators, and tour managers.

24. In 2007, Hongzhi Li founded the Academy, a secondary school. It is designed to be a feeder school for Shen Yun. Under the guise of cultural education, the Academy has recruited thousands of children to provide a large, stable, forced labor market for Hongzhi Li's forced labor scheme. Relying on a network of employees and instructors hand selected by Hongzhi Li, the Academy prepares the child laborers to be dispatched to Shen Yun as dancers or musicians.

25. Hongzhi Li controls, directs, and manages the Academy. He hand-selects the Academy's employees, administrators, and instructors.

26. In 2011, Hongzhi Li founded the College, a post-secondary institution. It is also designed to be a feeder school for Shen Yun. Under the guise of higher education, the College has

recruited thousands of children to provide a large, stable labor market for Hongzhi Li's forced labor scheme.

27. Hongzhi Li controls, directs, and manages the College. He hand-selects the College's employees, administrators, and instructors.

28. Dragon Springs is a 400-acre hilltop property in Cuddebackville, New York where Shen Yun, the Academy, and the College are headquartered. Dragon Springs contains Shen Yun offices, factories, and rehearsal spaces, the campuses for the Academy and the College, and dormitories for the child laborers. Colloquially known as "the Mountain," Dragon Springs is the heavily guarded command center where Hongzhi Li perpetuates the forced labor scheme.

29. Hongzhi Li controls, directs, and manages Dragon Springs. He hand-selects the employees and administrators of Dragon Springs.

30. Decision-making authority at Shen Yun, the Academy, the College and Dragon Springs is deeply centralized within Hongzhi Li. Hongzhi Li makes ultimate decisions about, for example, whether a child laborer is permitted to leave Dragon Springs, what tour groups the child laborers should be placed in, and whether any child laborer in Shen Yun should be hired, moved to a different function, or expelled.

31. Though Shen Yun, the Academy, the College, and Dragon Springs purport to be separate organizations, there is little to no distinction between them. They do not exercise independent business discretion outside of the direction of Hongzhi Li. Employees of one are often employed by another. For example, a dance instructor at the Academy or College is often a tour manager at Shen Yun; a Shen Yun tour manager organizes the child laborers' daily schedules at the Academy. All employees at Shen Yun, the Academy, the College, and Dragon Springs are chosen by Hongzhi Li and act on his authority. Several high level administrators at Shen Yun, the

College, the Academy and Dragon Springs are his direct reports, with Rui Lee serving as his right hand lieutenant and company manager . Shen Yun, the Academy, the College, and Dragon Springs exist at and operate out of the same address where Hongzhi Li maintains a residence.

32. On information and belief, Shen Yun, the Academy, the College and Dragon Springs all acted as a single integrated enterprise with no arm's length relationship between or among them. At all material times, they had substantially identical management, business purpose, operations, supervision and ownership.

33. Given the unified purpose, common employees and management, and inability to distinguish between when actors are working on behalf of Shen Yun, the Academy, the College, and Dragon Springs, Plaintiffs refer throughout this Amended Complaint to the action of “Defendants” as a collective whole – a unified commercial enterprise to exploit child labor and traffic young children, including Plaintiffs, operated by Hongzhi Li.

Shen Yun Is A Commercial and Political Enterprise Designed to Serve the Interests of Hongzhi Li

34. Shen Yun is a profitable business. Shen Yun's net income has grown steadily over the past decade and a half, from just under \$4.8 million in fiscal year 2011 to a record-breaking \$33.4 million in fiscal year 2023. Last year, Shen Yun reported \$51.5 million in revenue with just under \$266.2 million in assets.

35. Hongzhi Li and Rui Lee profit handsomely from Shen Yun. With personal assets likely in the tens of millions of dollars, they maintain a lavish lifestyle with palatial residences at Dragon Springs and elsewhere. Rui Lee is known to have a penchant for expensive clothing and luxury brands, including Hermes, Van Cleef, and Ferragamo.

36. Despite skyrocketing profits, Shen Yun is nonetheless designated a 501(c)(3) tax exempt organization whose reported mission is to “bring together talented artists of different nationality [sic] to revive the true, five-millennia-old artistic traditon [sic] of China.”¹

37. To be sure, a typical Shen Yun performance involves classical Chinese dance accompanied by traditional Chinese instruments. Shen Yun dancers perform wearing intricate costumes, often representing ancient Chinese figures from history and folklore. Each scene is set against a digital backdrop, typically depicting traditional Chinese landscapes and ancient Chinese imagery. Ostensibly, Shen Yun is cultural entertainment.

38. More accurately, however, Shen Yun is agitprop in service of Falun Gong, the political movement founded, controlled, directed, and managed by Hongzhi Li. Falun Gong combines fervent opposition to the Chinese Communist Party with self-improvement practice and meditation exercises.

39. According to several statements made by Hongzhi Li, Falun Gong is not a religion. In Hongzhi Li’s first lecture in the United States in 1996, he stated he would like to “make it clear” that he was “most definitely not forming some organized religion here.” In Hongzhi Li’s various online lectures and publications he has declared, at different points, that Falun Gong is “not a religion,” “not an organized, institutional religion,” “not a religious venture,” and “[not] religious in form.” In one lecture, Hongzhi Li advises Falun Gong students not to dress in a manner that “looks religious to other people” so as not to give people the impression that Falun Gong is a religion.

¹ *Shen Yun Performing Arts Inc: Full Text of “Full Filing” for Fiscal Year Ending Dec. 2023*, ProPublica, <https://projects.propublica.org/nonprofits/organizations/208812402/202421039349300917/full> (last updated Mar. 27, 2025).

40. Hongzhi Li, in lectures and interviews, has repeatedly reassured those interested in Falun Gong that as it was not a religion, they did not need to give up their own religions to be a part of the movement. In a New York Times interview, Hongzhi Li compared Falun Gong's practices as more akin to a morning exercise that could keep people fit.

41. In sum, Falun Gong's purpose is primarily political and cultural.

42. Shen Yun, too, is not a religious organization; nor does it attempt, in its various advertising, promotional and organizational materials, to portray itself as such. On its own website, Shen Yun describes itself as a "premier classical Chinese dance and music company." Its self-described "mission" is to "revive traditional Chinese culture, the same heritage of five millennia that the Chinese Communist Party (CCP) has spent a century trying to destroy." On one blog post on Shen Yun's own website, Shen Yun's "Master of Ceremonies" summed it up aptly: "Shen Yun is a performing arts company, not a religion."²

43. Nor is the purpose of Shen Yun's performances to spread a religious message. A typical Shen Yun performance incorporates resonances of Falun Gong's cultural and political message, with several scenes glorifying China before communism, demonizing the ruling Chinese Communist Party, and portraying Falun Gong practitioners as a persecuted community. Some scenes depict Falun Gong practitioners being violently beaten by Chinese state police. Others show Falun Gong practitioners being subjected to organ harvesting.

44. Thus, the main purpose of Shen Yun's performances, and therefore the main role of its performers, including its child laborers, is to portray classical Chinese dance and music, depict

² John Perry, *What Religion is Shen Yun?*, Shen Yun Performing Arts, <https://www.shenyun.org/blog/view/article/e/IIGC9MO8f18/what-religion-is-shen-yun> (last visited July 28, 2025).

the political persecution of Falun Gong under the CCP, and commercially enrich Shen Yun, Hongzhi Li and his associates, and the remaining Defendants.

45. Shen Yun regularly sets up Falun Gong marketplaces in the lobbies outside the performance venues, offering books written by Hongzhi Li and other Falun Gong paraphernalia for sale.

46. Falun Gong and Shen Yun have at various points taken positions contrary to the position they now take publicly and in this and other lawsuits within the United States about their relationship to religion and to each other. For example, it has been reported that in legal proceedings in Korea, Shen Yun has repeatedly asserted (i) it is not a religious entity, and (ii) it is not associated with Falun Gong. Similarly, in a YouTube video on a platform run by, on information and belief, Li's nephew, Shen Yun's own practitioners made clear that it was a "misconception" that Shen Yun is the same thing as Falun Gong" and that, far from being a spiritual or religious organization, Shen Yun was "a performing arts company with a mission of reviving 5,000 years of traditional Chinese culture."

47. Defendants' contradictory and self-serving representations are based solely on legal convenience and are therefore insincere.

The Life Cycle of the Forced Labor Scheme

48. At all relevant times, Plaintiffs were exploited by Defendants as child laborers in Defendants' forced labor scheme as detailed below. After reaching the age of maturity, Plaintiffs were exploited by Defendants in the same forced labor scheme.³

49. Defendants acted in concert to perpetuate the forced labor scheme from start to finish. Defendants set the forced labor scheme in motion by targeting children. Defendants

³ Any reference in this section to "children" or "child laborers" includes Plaintiffs.

typically recruited the children of Falun Gong practitioners like Plaintiffs who view Hongzhi Li as a moral authority and have typically been subjected to his influence for decades. Those few children culled from outside the Falun Gong community were quickly indoctrinated by Defendants into practicing Falun Gong and revering Hongzhi Li as the ultimate authority.

Training at Dragon Springs

50. Defendants recruited children under the pretext of an education at the Academy and, in certain instances, the College. But upon arriving at Dragon Springs, the children were quickly set on a course by Defendants to become child laborers for Shen Yun. Defendants sorted the child laborers into different groups based on area of talent. Each group followed a distinct training schedule, but the end goal for all was the same: their exploitation on the Shen Yun world tour.

51. Academics took a feeble second place to an extreme training schedule strictly enforced by Defendants. For example, Defendants required those child laborers designated to become Shen Yun dancers (including Plaintiffs) to commit twelve to fifteen hours each day to dance training and/or rehearsal, at least six days a week. Academics, on the other hand, were limited to just two to three hours of classroom time per day. Defendants packed the schedules so tightly that the child laborers often slept no more than five hours each night.

52. During training, Defendants subjected the child laborers to extensive abuse, including humiliation and violence. Dance instructors forced the child laborers' bodies into unnatural positions and regularly caused injuries. Slaps and beatings were a daily occurrence. A late-arriving child laborer could expect to have an instructor's shoe strike their head moments after walking in, and then be forced to run about three miles and perform a dance routine 100 times over. For the girls, dance training often began with weigh-ins and ended with their instructors

saying they were too fat. Defendants told the child laborers that being subjected to violence was an indication of talent, and so they should be thankful for being beaten.

53. Defendants denied the child laborers medical treatment, instead requiring that they dance for over ten hours a day with torn Achilles tendons, severe back pain, and shoulder injuries. For many child laborers, including Plaintiffs, this resulted in unending physical pain that persists with complications to this day.

54. When the child laborers were not enduring training abuse, Defendants severely restricted their ability to leave Dragon Springs. Defendants collected the passports and immigration paperwork of every child laborer, locked the passports away in a safe in the Shen Yun office, and prevented any child laborer from leaving Dragon Springs without permission. Passport collection was strictly enforced and monitored, and no child laborer was allowed access to their own passports outside of the Defendants' monitoring and permission. Indeed, when laborers as adults attempted to quit or leave, Defendants would resist returning their passport to them as part of their scheme to force them to stay.

55. On the few occasions Defendants did permit the child laborers to leave, Defendants instructed the child laborers not to discuss life on the Mountain or to only speak positively about their experiences, including to their own parents. Defendants for the most part did not permit the child laborers to leave for routine medical care, including after having sustained injuries.

56. Defendants menaced the child laborers with other physical constraints. Dragon Springs is surrounded by dense forest with a high fence lining much of the perimeter. The compound was regularly patrolled by armed guards and German shepherds. The lone entrance to Dragon Springs was manned by guards tracking the movement of every person entering and leaving the compound, and the gates to the outside world could not be opened without Defendants'

permission. Moreover, the compound is so large and rural that it was impractical for the child laborers to leave without vehicles. Defendants cowed the child laborers into avoiding the forest because, according to Rui Lee, guards patrolling the grounds might mistake the child laborers for intruders, resulting in serious injury or even death. Defendants, through the admonitions of Rui Lee and Hongzhi Li, warned the child laborers to beware of bears living in the forest.

57. The child laborers had little knowledge or experience of the world outside the compound, due to their limited and tightly controlled and monitored opportunities to leave the compound. As such, even if the child laborers could overcome the impossible physical constraints that kept them within the compound, they had little practical opportunity to leave Dragon Springs.

58. Defendants also tightly controlled the child laborers' access to information. Defendants banned the use of smartphones by the child laborers and restricted internet access to public terminals that could reach only pre-approved websites, including the Epoch Times, which is Falun Gong's Pravda-style newspaper. Defendants allowed the child laborers internet-free iPod Touch devices loaded with pre-approved materials such as Hongzhi Li's teachings, Falun Gong exercise music, and Beijing Dance Academy videos. The devices were otherwise locked. Defendants banned the possession of books, music, and other media that did not conform to the singular perspective of Hongzhi Li and Falun Gong. Defendants discouraged the child laborers from speaking with anyone outside the Falun Gong community by warning that such individuals were untrustworthy, mentally polluted agents of the Chinese Communist Party who would cause the child laborers misery and misfortune.

59. Defendants conducted "device checks" several times yearly. These device checks began with Defendants ordering the child laborers to a classroom and locking them in. Then, Defendants went room-by-room in the dormitories inspecting any iPods owned by the child

laborers to review any photos, videos, and applications. Any child laborer with an iPod containing unauthorized content faced severe punishment.

60. Defendants enforced a repressive code of conduct that required strict adherence to the rules and dictates of Hongzhi Li. Falun Gong instruction at the Academy and the College commanded total obedience to him. Defendants repeatedly told the child laborers that defying Hongzhi Li constituted a moral failing that would result in the loss of his purported protection, rejection from the Falun Gong community, physical harm, or even death. Child laborers were instructed by Defendants to spy on one another and report their peers for violating rules or disobeying Hongzhi Li.

61. Defendants also strictly regulated personal interactions among the child laborers. Sexes were segregated to such a degree that the child laborers faced punishment for talking to the opposite sex or even looking in their direction. Dating could result in expulsion. As the child laborers entered their twenties, Rui Lee often paired them up for marriage to further the forced labor scheme. Defendants considered the ideal relationship among child laborers to be between a U.S. citizen and a foreign national because this pairing, if followed by marriage, would result in the most favorable immigration benefits.

62. Defendants instilled fear in the child laborers through impromptu “school-wide” assemblies at the Academy. Nearly every child laborer, including Plaintiffs, feared these assemblies because they regularly involved public humiliation and castigation of Plaintiffs and their peers.

63. At one such assembly in or around 2011, then-principal of the Academy, Huaping Guo, publicly berated the then-roommate of Plaintiff Cheng for reading purportedly pornographic material. The roommate had been reading manga, which are Japanese comic books popular among

children at the time. The roommate was publicly shamed and threatened with expulsion in front of Hongzhi Li, whose silence during the assembly was understood to indicate to all child laborers present that he approved of the targeted humiliation.

64. At another such assembly in or around 2012, Hongzhi Li read aloud a newspaper article about a former child laborer who had departed the Mountain and later took his own life. Hongzhi Li went on to explain to the child laborers that because this man chose to leave, he lacked a purpose in life, which resulted in his suicide. Hongzhi Li cautioned the child laborers that should they leave, they too would end up dead.

65. In or around 2015, Hongzhi Li called another public humiliation assembly with particular urgency. Tony, a former Shen Yun principal dancer and, at the time, an instructor at the Academy, had been caught playing online video games. Accessing the internet was among the most serious transgressions in the eyes of Hongzhi Li, so Tony was publicly shamed (while loudly sobbing) and threatened with expulsion. As a result, the Academy required every child to sign a contract in which they promised not to use the internet.

Working on the Shen Yun Tour

66. This system of coercion, control, and abuse caused the child laborers to fear the consequences of disobeying Hongzhi Li—including by refusing to dance. Therefore, when the child laborers were ordered by Defendants to leave Dragon Springs and go dance on the Shen Yun world tour, all did as they were told.

67. On the Shen Yun tour, conditions did not improve from life at Dragon Springs. Shen Yun exacted from its child laborers a punishing work schedule that forbade down time. Each Shen Yun tour ran each year from December to May, and included anywhere from 80 to 150 performances. Shen Yun tour managers withheld the child laborers' passports except to pass

through border crossings. Despite often being near world-famous landmarks and tourist destinations, the child laborers rarely had time to take in the sights. Usually, the child laborers did not even know where Shen Yun had taken them. They cycled through a seemingly endless loop between the bus, the venue, and the hotel. To save money, Shen Yun often arranged for the child laborers to travel from city to city by overnight bus, eliminating the need for hotel accommodations on many nights.

68. Shen Yun required the child laborers to set up and take down the performance sets and equipment for every show. Boys unloaded and set up stage, speakers, and projectors. Girls set up the backstage area and changing rooms.

69. A Shen Yun performance was a physically brutal affair. Each performance ran two and a half hours and involved intensive dance sequences with 12 to 18 costume changes under blindingly hot stage lights. As a result, the child laborers endured sauna-like conditions onstage. Makeup regularly melted off and sweat pooled on the floor between scenes. During performances in high-altitude cities, several child laborers struggled to breathe properly. Shen Yun tour managers required the child laborers to perform every show through illness and injury, without exception. In many instances, the child laborers tumbled and flipped on torn tendons, sprained ankles, and broken bones. At several shows in Mexico, child laborers with food poisoning were forced to run to the bathroom every other scene to expel diarrhea.

70. Shen Yun overwhelmed the child laborers with intense pressure to make every performance perfect. Mistakes often resulted in public humiliation by the tour managers. For example, “conclusion sessions” followed every performance in which the child laborers had to confess to their mistakes from that day’s performance. Often taking place on the bus, conclusion sessions were sometimes hours long and involved tour managers screaming at the child laborers

over a megaphone. They usually took place before or after the tour managers called Hongzhi Li to report any mistakes to him. Hongzhi Li and Shen Yun expected the child laborers to blame themselves for any performance mistake, telling them that errors would doom their audience to hell.

71. Shen Yun explicitly tied performance mistakes to an individual child laborer's moral worth. If a child laborer admitted to mistakes, as they were compelled to do, social isolation nevertheless followed. Any child laborer admitting to mistakes was treated as morally inferior and ostracized by their peers at the hotels, on the bus, or during meals. As a result, the child laborers faced every performance with deep senses of panic, anxiety, and dread. In one instance, a child laborer attempted suicide while on the Shen Yun tour.

72. About once a month, Shen Yun gave many of the child laborers a few hundred dollars in exchange for several hundred hours of labor. Beaten down by the forced labor scheme, these highly vulnerable children did not comprehend the extent to which they were being exploited. Instead, they were simply focused on surviving.

73. At the conclusion of each world tour, Shen Yun returned the child laborers to Dragon Springs where the cycle of Hongzhi Li's forced labor scheme began again.

PLAINTIFF SUN

74. In 2007, Plaintiff Sun was 14 years old and living with his parents in New Zealand. Sun's parents practiced Falun Gong and were followers of Hongzhi Li.

75. Around this time, Hongzhi Li began instructing his followers about Shen Yun, an organization he founded in New York whose purpose was to revive Chinese culture before Communism. Sun and his parents understood Shen Yun to be crucial to the Falun Gong practice.

76. In the spring of 2007, Sun auditioned to be a dancer for Shen Yun backstage after a show in New Zealand. Sun failed this audition, but the Shen Yun scouts told him to try again the following year. After trying again in 2008, he was invited to New York for a three-month trial period.

77. On May 10, 2008, Sun flew from New Zealand to New York, accompanied by Falun Gong practitioners he barely knew. Sun was then dropped off at a Falun Gong parade in Flushing, Queens, where he was picked up by a third Falun Gong practitioner he did not know. He was later driven to Dragon Springs.

78. Sun arrived at Dragon Springs when Hongzhi Li's forced labor scheme was still in its infancy. At the time, there existed one multi-purpose room that doubled as a dance classroom, as well as a cafeteria and a visitors' center. The College did not yet exist. During the trial period, the Academy housed Sun and sixteen other children in a windowless storage space above the visitors' center. Sun and many of the other children could not stand up straight because of the low ceilings.

79. Dance training during the trial period was intense and aggressive. For example, the Academy's instructors forced Sun into a side split, causing internal bleeding and several tears to his leg muscles. They forced Sun to master movements physically impossible for most people, including kicking the leg upward such that the toes reached the chin while in a standing position.

80. Sun departed Dragon Springs as planned in early August 2008. Hongzhi Li instructed him that the Academy would arrange a visa for him to return as a full-time student.

81. In late August 2008, Sun returned to Dragon Springs as a full-time student at the Academy. Upon arrival, Sun's passport was taken away and locked in a safe where he could not access it. The Academy placed Sun in "08 class" with approximately seventeen other boys.

82. The Academy enforced a grueling training schedule. For example:

- (a) 5:30-6:00 to 7:15 am: run laps around the lake and warm up.
- (b) 7:15 to 7:55 am: breakfast.
- (c) 7:55 to 8:10 am: Falun Gong practice.
- (d) 8:10 to 8:55 am: dance training consisting of specific Falun Gong exercises.
- (e) 9:00 to 11:55 am: three periods of academics.
- (f) 11:55 am to 12:10 pm: Falun Gong practice.
- (g) 12:10 to 1:00 pm: lunch, where Sun often ate as fast as he could so he could take a short nap.
- (h) 1:00 to 1:30 pm: Sun warmed up again.
- (i) 1:30 to 3:30 pm: high-performance dance training for two hours.
- (j) 3:30 to 5:00 pm: classical or folk-dance training, or high-risk acrobatics.
- (k) 5:00 to 6:10 pm: Falun Gong study and practice.
- (l) 6:10 to 7:00 pm: dinner, though the dancers, including Sun, were often expected to finish early and warm up for a third time.
- (m) 7:00 to 10:00 pm: dance rehearsal, including dress rehearsals as tours approached. Because Sun had a lot of lead roles, he often had to skip dinner to begin rehearsing early. These rehearsals could extend well into the early morning hours as performance dates approached.
- (n) 10:00 to 11:00 pm: at the encouragement of their instructors, the dancers were expected to engage in “self-practice,” which involved working on their own dancing. Defendants considered this final hour to be a demonstration of diligence, so leaving was not an option. Hongzhi Li was known to peer in to observe who was present at this hour.
- (o) 11:00 pm to 2 am: while Sun was ostensibly allowed to return to his room and sleep at this time, he could still anticipate people coming to his room to ask him questions to ensure his loyalty and obedience.

83. For Sun, the Academy offered woefully inadequate academics. Instructors regularly allowed him and the other dancers to cheat on exams because doing so enabled them to

focus on dance training. Sun was often allowed by the Academy's instructors to sleep during class because the instructors knew the dancers were not getting enough sleep.

84. In or around August 2008, Hongzhi Li required Sun to begin training for the Shen Yun tour, which kicked off the following month. Sun's first Shen Yun tour ran from December 2008 to May 2009 and consisted of 120 performances across the United States and Asia. Sun performed in nearly every scene, dancing anywhere from 2.5 to 5 hours on any given day.

85. After the second tour, Hongzhi Li made Sun a principal dancer. Sun toured with Shen Yun from December to May every year for the next five years. When he was not on tour, Sun was required to be training at Dragon Springs.

86. Upon arriving at a venue, Sun had to unload the trucks and build out the set. He then began rehearsing for the show and organizing all the pre-show props, costumes, and make-up. There was often a series of several performances at each venue, with one or two performances each day. After the performance series concluded, Sun dismantled the sets and reloaded the trucks. Sun, together with the other boys, regularly carried two 250-pound projectors, tied up long industrial cables, and folded heavy backdrops weighing over 200 pounds.

87. Sun, even as an adult, was unable to keep his passport. On one occasion, Sun tried to retain his passport as he was an adult. Defendants compelled him to return it into their possession.

88. While on tour, Sun and the other dancers did not receive academic instruction.

89. Defendants⁴ required Sun to take part in the following Shen Yun tours:

- (a) December 2009 to May 2010: a brief U.S. tour followed by an Asian tour, performing approximately 130 shows in over six countries.

⁴ Defendant College only began requiring tours for Sun in 2012.

- (b) December 2010 to May 2011: North American tour, performing approximately 110 shows in over 20 cities.
- (c) December 2011 to May 2012: brief North American tour, followed by a European tour, performing approximately 140 shows in over twelve countries.
- (d) December 2012 to May 2013: North and South American tour, performing approximately 100 shows in over five countries.
- (e) December 2013 to May 2014: Asian tour, performing 130 shows in over six countries.
- (f) December 2014 to May 2015: European tour, performing approximately 120 shows in over twelve countries.

90. When at Dragon Springs, Sun occasionally received money directly from Hongzhi Li via cash or from Shen Yun via digital bank transfer which enabled him to pay for minor personal necessities and food. These payments ranged from \$100 to \$500 and happened irregularly.

91. When on the Shen Yun tour, Sun was paid sporadically by Hongzhi Li. He received \$100 every so often in his first year, which incrementally grew to \$500 in later years. From January 2015 until he was expelled in May 2015, Sun was paid approximately \$1,743 a month.

92. Sun sustained serious injuries while at the Academy and on tour with Shen Yun but was not given time off to heal or seek medical care.

93. For example, in May 2008, Sun sustained extensive internal bleeding when a dance instructor at the Academy required two other children to force Sun into a side split, a position he was required to maintain for ten minutes a day every day for three months. Sun experienced internal bleeding and extreme pain for several weeks as a result of this forced position. To this day, he has scarring on his legs because of it.

94. In or around 2010, Sun suffered an injury to his left shoulder when a dance instructor at the Academy required him to stretch down from a dance bar while the instructor

pushed Sun's back down and forward with extreme force. Sun required several weeks to fully recover but was forced to continue dancing throughout. He still experiences pain in his left shoulder today.

95. In or around 2012, Sun sustained an injury to his ankle during a Shen Yun performance in Canada. As a result, he could not put on his costume. When the fire alarm sounded unexpectedly, Sun stood outside in freezing temperatures without a coat and was unable to put any weight on his foot. Sun limped over to the tour manager seeking help, but the tour manager replied, "as long as you can walk, you can flip."

96. In or around 2012, Sun began to experience severe back pain from high intensity tumbling and flexibility training. Characterized by sharp, stabbing sensations, the pain became so intense that sometimes he could not lift his legs or move at all. This back pain continues today and has required Sun to seek regular care from a chiropractor.

97. In or around 2014, Sun tore his Achilles tendon from years of overuse. On many mornings, he had to crawl to the bathroom. Still, Shen Yun required that Sun perform, which he did without missing a show. Several Shen Yun tour managers were aware that Sun had sustained a serious injury, but none arranged for medical care. Instead, they forced him to perform. As a result, Sun experiences regular pain that continues to this day.

98. At no point did Sun feel he could leave Shen Yun, the Academy, or Dragon Springs. Based on Defendants' representations, Sun believed that should he leave, he would die within a month, go to hell or experience a fate even worse than hell. This harm would not only befall him, but his family too. Hongzhi Li repeatedly told him that he would not survive outside Dragon Springs because accidents, misfortune, or disease would kill him. Should he leave, Hongzhi Li told him, his life would be meaningless and he would likely die by suicide.

99. In or around 2014, Defendants began to target Sun for public humiliation. For example, Hongzhi Li and Rui Lee set upon a whispering campaign that Sun was hell bound and any association with him was to be avoided. As a result, Sun was ostracized, isolated, and subject to additional scrutiny from Defendants, which involved the assignment of three people who followed Sun everywhere and reported his activities back to Hongzhi Li and Rui Lee. Hongzhi Li and Rui Lee created an environment where essentially everyone had to report Sun's missteps to Rui Lee.

100. Then, in or around 2015, Sun posted to social media from a hotel in Barcelona, Spain while on tour. This enraged Hongzhi Li, who ordered the Shen Yun tour manager to humiliate Sun in front of the tour group. The Shen Yun tour manager required Sun to stay in the theater, writing letters of apology. He was also forced to delete his social media account. By this time, Sun was an adult.

101. On May 24, 2015, Hongzhi Li terminated Sun from Shen Yun and expelled him from the College because, as Sun later found out, he had been caught interacting with girls. Prior to leaving, Defendants confiscated Sun's digital devices and did a full body search to ensure he was not hiding anything. Sun vacated Dragon Springs and left the United States soon thereafter.

102. Despite leaving Dragon Springs, Sun continued to be under the control of Defendants. From June 2015 to September 2015, Sun worked for the Academy's branch in Taiwan as a dance instructor. Just like at Dragon Springs, Sun continued to be bullied and monitored by Defendants in Taiwan.

103. In February 2016, Sun returned to New Zealand. From February 2016 to February 2018, Sun sold tickets to Shen Yun performances in Wellington and Auckland. He distributed

fliers, prepared and delivered envelopes by hand, attended meetings and calls, and worked in ticket booths. Sun was not compensated for this work.

104. From June 2017 to March 2019, Sun also worked for Vision Times, an online newspaper controlled by Hongzhi Li and Falun Gong. He was not compensated for this work.

PLAINTIFF CHENG

105. In 2008, Cheng was living in New Zealand with her mother. Cheng's mother practiced Falun Gong and was a devout follower of Hongzhi Li.

106. Cheng was required by her mother to stay up to date on Falun Gong through websites such as minghui.org, which spread news about Hongzhi Li's latest decrees. These websites also shared stories about the misery suffered by those who did not abide Hongzhi Li, such as dying in car accidents or falling ill with cancer. Cheng's mother also volunteered for Vision Times.

107. Cheng and her mother attended a conference in 2008 in New York where they and 7,000 other Falun Gong practitioners listened to Hongzhi Li speak about the Academy and Shen Yun projects. He described the Academy and Shen Yun as the highest forms of honor in Falun Gong and deeply important to the movement.

108. Heeding these messages, in or around February 2009, Cheng was taken by her mother to a Shen Yun performance in Auckland, New Zealand. Afterwards, Cheng and her mother went backstage where they met a Shen Yun tour manager, who asked Cheng to mirror some dance movements for Cheng. Cheng obliged. Cheng's mother later told Cheng that the backstage meeting was an audition for the Academy, which she did not pass.

109. In May or June 2009, Shen Yun called Cheng and told her to visit Dragon Springs for an audition. She went, staying at a Falun Gong practitioner's house who she did not know. Cheng did not pass the audition, with Hongzhi Li saying she was too short.

110. In or around February 2010, Cheng and her mother attended another Shen Yun performance and went backstage once again to audition for a Shen Yun tour manager. This time, she passed.

111. On June 4, 2010, Cheng arrived at the Academy. She was 13 years old. Upon arrival, Jun Liu, an employee of Defendants, took away her passport. It was kept locked away in a safe in the Shen Yun office.

112. Cheng's schedule at the Academy was similarly rigorous to Sun's. She rose typically between 6:00 and 7:00 am. From 7:55 to 8:10 am, she did Falun Gong exercises. After that, until about 9:00 am, she was required to perform Falun Gong sitting and standing exercises. 9:00 am to 12:00 pm was the only part of the day for academics. Then came lunchtime, which was followed by dance training for the rest of the day until 11:00 pm. During her day, Cheng would experience intense sleep deprivation.

113. During dance training, Cheng was frequently physically assaulted by the Academy's instructors when she made mistakes or when her performance did not meet expectations. Violence became so commonplace that the children often began crying before the instructor had even entered the room.

114. Academy instructors weighed Cheng and the other girls daily, reading out loud the names of those who weighed more than 100 pounds or failed to lose weight. Cheng regularly faced ridicule about her weight. Once, when Cheng weighed over 100 pounds, the instructors called her a "postpartum woman."

115. The academics offered by the Academy were cursory at best. Subjects included algebra, science, Chinese history, Chinese language, and English language. Instructors were told by the Academy and Hongzhi Li not to give homework and to ensure that the children always passed. Cheng's delayed math skills were never addressed.

116. The Academy taught Cheng and the other children to denigrate any standard subject like science. Prior to science class, for example, Cheng's instructor showed a documentary from Falun Gong that disclaimed the necessity of understanding science.

117. Mondays were supposed to be for rest. But Cheng was expected to still practice dance for several hours on her own time.

118. In June 2013, Cheng was placed by Hongzhi Li into a Shen Yun tour group, Group 8. She was 15 years old. In July 2013, Hongzhi Li moved Cheng to another Shen Yun tour group, Group 10. Hongzhi Li arranged and rearranged the tour groups personally.

119. From June 2013 to December 2013, Cheng's daily schedule at the Academy focused on intensive, daylong rehearsals for the upcoming Shen Yun tour.

120. In December 2013, at 16 years old, Cheng began touring the world as a dancer for Shen Yun's Group 10. She earned \$400 per month, paid via bank transfer. Cheng heard a constant refrain, repeated by Academy instructors, Shen Yun tour managers, and Hongzhi Li, that she was lucky to be getting paid at all.

121. Cheng's 2013-2014 Shen Yun tour group traveled to cities across the United States, with Cheng performing in approximately 100 shows.

122. Cheng's 2014-2015 tour group went to South America, with Cheng performing in approximately 87 shows. Cheng returned to Dragon Springs after touring in May 2015.

123. During tour performances, Cheng felt an immense amount of pressure from Defendants not to make any mistakes. Cheng would get scolded via a microphone on the bus in front of the whole group, or insulted during the performance “debriefs” when she made any mistakes. This resulted in Cheng experiencing multiple panic attacks and severe anxiety, which would begin as soon as the intro music started and the audience took their seats.

124. While on tour, Cheng and the other dancers did not receive academic instruction.

125. At all times while on tour with Shen Yun, Cheng was not free to leave. Her passport was in the possession of Shen Yun. She had severely restricted access to phones and the internet. Her schedule was constantly controlled and restricted by Defendants and she had no freedom of movement. She was not allowed any independent travel or excursions; she had no opportunity to have access to the outside world in any capacity, and she had no option to ever leave. She was constantly told by Defendants that outsiders who were not affiliated with Defendants or Falun Gong were untrustworthy and possible CCP agents; this resulted in it being impossible for her to seek any external assistance. Cheng sincerely believed she would suffer harm if she left. Defendants told Cheng that she was selected to be part of Shen Yun, and giving it up would be a fate worse than death. The physical and psychological control that Defendants over the child laborers, including Cheng, was totalizing.

126. Cheng sustained serious injuries while at the Academy and on tour with Shen Yun but was not given time off to heal or seek medical care.

127. In or around 2010, soon after arriving at the Academy, Cheng sprained her ankle while executing a jump during dance training. She was not offered medical care and was required by the Academy’s dance instructors to continue dancing as if nothing was wrong. Despite obvious excruciating pain, Cheng was forced to continue dancing.

128. In or around 2011, Cheng sustained a second injury at the Academy. During dance training, an instructor held Cheng in an upside down position and stretched her left arm backwards beyond its natural range of motion. As a result, Cheng lost all feeling in her left arm and could not move it for nearly a month.

129. At her tumbling training immediately following this injury, Cheng tried to explain to the instructor that she could not do the required movements, like walkovers and cartwheels, without using her left arm. The instructor did not believe her and ordered her to practice. In desperation, Cheng approached the dance bar and repeatedly swung her limp arm against it to demonstrate that it lacked feeling and control. After witnessing the bar shaking and Cheng's repeated unbothered whacking, the instructor summoned the Academy's principal, who told Hongzhi Li about Cheng's injury. Rather than arranging for medical care, Hongzhi Li ordered the principal to meditate with Cheng.

130. The Academy did not allow Cheng to rest for this injury and required her to participate in dance trainings as though nothing was wrong.

131. Cheng's left shoulder is permanently damaged as a result of Defendants' failure to treat Cheng.

132. In or around 2011, Cheng sustained a third injury at the Academy, this time to her back. Once again, a dance instructor forced Cheng's body into an unnatural position resulting in sharp and sustained back pain. As a result, she experienced severe back pain daily for nearly three years.

133. Throughout her injuries, Cheng endured because Defendants told her and the other children that complaining or speaking up would be harmful.

134. Defendants told Cheng that good girls did not menstruate. They told her that menstruation was a sign of impurity. The other children monitored garbage cans and reported back if they found any remnants of sanitary napkins. When Cheng did ultimately begin to menstruate, she was shamed by Academy instructors for not working hard enough. As a result, Cheng experienced major anxiety surrounding menstruation and feminine hygiene.

135. On June 18, 2015, Cheng was notified that Hongzhi Li had placed Cheng's tour group on hold, preferring that they become dance instructors. A few days later, the Academy tour manager told Cheng that Hongzhi Li required her to work in a costume factory on campus, where she had to organize, clean, and hang up costumes from older Shen Yun performances (roughly 16,000 costumes total). Cheng worked in the costume factory for about six months, sewing buttons and changing coat hangers.

136. In or around November or December 2015, Hongzhi Li determined he no longer had a need for Cheng's labor. Therefore, Cheng was notified that she did not get into the College. Soon thereafter, she returned to New Zealand.

137. Cheng continued to be under the control of Defendants and continued to work without pay. From 2016 until 2018, Cheng sold tickets for Shen Yun performances in Wellington, New Zealand. She also worked for Vision Times. She was not compensated for this work.

PLAINTIFFS' DAMAGES

138. In addition to the damages mentioned above, as a direct and proximate cause of Defendants' conduct, Plaintiffs suffered, continue to suffer, and will suffer in the future, psychological injuries, including but not limited to, anxiety, panic attacks, post-traumatic stress disorder, stress, suicidal ideations, distrust of authority, shame, and fear, as well as physical injuries. All of these injuries caused and will cause Plaintiffs noneconomic damages.

139. Plaintiffs also suffered and continue to suffer economic damages including but not limited to unpaid wages, loss of past and future income, and costs of mental health treatment.

140. Defendants acted with an outrageous indifference to a highly unreasonable risk of harm and with a conscious indifference to the health, safety, and welfare of others, including Plaintiffs. Therefore, Plaintiffs are entitled to punitive damages against Defendants.

COUNT I

Violation of TVPRA 18 U.S.C. §§ 1589 and 1595 – Forced Labor – Direct Liability

On behalf of Plaintiffs against Defendants Shen Yun, Academy, Dragon Springs, and Hongzhi Li; on behalf of Plaintiff Sun against Defendant College

141. Plaintiffs incorporate and reallege each and every allegation set forth in the preceding paragraphs as if set forth here in full.

142. Defendants Shen Yun, College, Academy, Dragon Springs, and Hongzhi Li violated 18 U.S.C. §§ 1589 and 1595 by knowingly providing and/or obtaining the labor of Plaintiffs through force, threats of force, physical restraint and/or threats of physical restraint; serious harm and/or threats of serious harm; and through a scheme, plan, or pattern to make Plaintiffs believe they would suffer serious harm if they did not perform their labor. They did this by, *inter alia*:

- (a) Abusing Plaintiffs;
- (b) Overworking Plaintiffs;
- (c) Restricting Plaintiffs' movements, including by possessing Plaintiffs' passports;
- (d) Limiting Plaintiffs' access to information;
- (e) Subjecting Plaintiffs to a restrictive code of conduct;
- (f) Depriving Plaintiffs of sleep;
- (g) Instilling fear in Plaintiffs of castigation, disobedience, speaking to outsiders, and leaving;

- (h) Humiliating Plaintiffs for any perceived disobedience; and
- (i) Refusing Plaintiffs' medical care.

143. Plaintiffs labored for little wages and under inhumane conditions because Defendants used violence and physical restraint, social isolation and humiliation, and indoctrination and coercion to cause Plaintiffs to believe that they could not refuse to work or leave without facing serious harm. Moreover, Plaintiffs could not leave because Defendants kept their passports.

144. Defendants exploited Plaintiffs as vulnerable children.

145. Plaintiffs suffered damages as a result of the conduct of Defendants Shen Yun, Academy, Dragon Springs, and Hongzhi Li.

146. Plaintiff Sun additionally suffered damages as a result of the conduct of Defendant College.

147. Plaintiffs are entitled to compensatory and punitive damages, and restitution in amounts to be determined at trial, together with injunctive relief, reasonable attorneys' fees and the costs of this action, and any other relief deemed appropriate.

COUNT II

Violation of TVPRA 18 U.S.C. §§ 1589 and 1595 – Forced Labor – Vicarious Liability

On behalf of Plaintiffs against Defendant Shen Yun

148. Plaintiffs incorporate and reallege each and every allegation set forth in the preceding paragraphs as if set forth here in full.

149. As alleged above, in violation of 18 U.S.C. §§ 1589 and 1595, Hongzhi Li “knowingly provide[d] or obtain[ed] the labor or services” of Plaintiffs “by means of force, threats of force, physical restraint, or threats of physical restraint,” “by means of serious harm or threats

of serious harm,” and/or “by means of any scheme, plan, or pattern intended to cause [Plaintiffs] to believe that, if that person did not perform such labor or services, that person or another person would suffer serious harm” 18 U.S.C. § 1589(a).

150. At all relevant times, Hongzhi Li was Shen Yun’s director, leader, employee, representative, and/or agent.

151. At all times, Hongzhi Li was acting in support of Shen Yun’s money-making activities such as its worldwide touring dance performances.

152. At all times, Hongzhi Li sought to further Shen Yun’s business interests.

153. Prior to obtaining and/or providing Plaintiffs’ forced labor, Hongzhi Li had acted similarly towards similarly situated children. Accordingly, his behavior was entirely foreseeable by Shen Yun.

154. Hongzhi Li’s acts in obtaining and/or providing Plaintiffs’ forced labor were within the context of his role as leader, director, employee, representative, and/or agent of Shen Yun.

155. Accordingly, Shen Yun should be held vicariously liable for Hongzhi Li’s actions under 18 U.S.C. §§ 1589 and 1595.

156. Plaintiffs suffered damages as a result of the conduct of Defendants Hongzhi Li and Shen Yun.

157. Plaintiffs are entitled to compensatory and punitive damages, and restitution in amounts to be determined at trial, together with injunctive relief, reasonable attorneys’ fees and the costs of this action, and any other relief deemed appropriate.

COUNT III

Violation of TVPRA 18 U.S.C. §§ 1589 and 1595 – Forced Labor – Beneficiary Liability

On behalf of Plaintiffs against Defendants Shen Yun, Academy, Dragon Springs, Hongzhi Li, and Rui Lee; on behalf of Plaintiff Sun against Defendant College

158. Plaintiffs incorporate and reallege each and every allegation set forth in the preceding paragraphs as if set forth here in full.

159. Defendants knowingly financially benefitted from participating in a venture which they know or should have known engaged in forced labor in violation of the TVPRA. 18 U.S.C. § 1595.

160. Defendants financially benefited, *inter alia*, because by using underpaid forced labor to put on their shows, they saved the money they would have had to use paying fair wages and taxes. As a result of the forced labor venture and their participation in it, Defendants were able to pocket a significant portion of the ticket sales from their worldwide tours.

161. Defendants knew or should have known that the venture they participated in engaged in providing and/or obtaining forced labor.

162. Plaintiffs suffered damages as a result of the conduct of Defendants Shen Yun, Academy, Dragon Springs, Hongzhi Li, and Rui Lee.

163. Plaintiff Sun additionally suffered damages as a result of the conduct of Defendant College.

164. Plaintiffs are entitled to compensatory and punitive damages, and restitution in amounts to be determined at trial, together with injunctive relief, reasonable attorneys' fees and the costs of this action, and any other relief deemed appropriate.

COUNT IV

Violation of TVPRA 18 U.S.C. §§ 1590 and 1595 – Trafficking With Respect to Forced Labor – Direct Liability

***On behalf of Plaintiffs against Defendants Shen Yun, Academy, Dragon Springs, Hongzhi Li;
on behalf of Plaintiff Sun against Defendant College***

165. Plaintiffs incorporate and reallege each and every allegation set forth in the preceding paragraphs as if set forth here in full.

166. Defendants Shen Yun, College, Academy, Dragon Springs, and Hongzhi Li, knowingly recruited, harbored, provided, obtained, and/or transported Plaintiffs for forced labor in violation of the TVPRA. 18 U.S.C. § 1590(a).

167. Plaintiffs suffered damages as a result of the conduct of Defendants Shen Yun, Academy, Dragon Springs and Hongzhi Li.

168. Plaintiff Sun additionally suffered damages as a result of the conduct of Defendant College.

169. Plaintiffs are entitled to compensatory and punitive damages, and restitution in amounts to be determined at trial, together with injunctive relief, reasonable attorneys' fees and the costs of this action, and any other relief deemed appropriate.

COUNT V

Violation of TVPRA 18 U.S.C. §§ 1590 and 1595 – Trafficking With Respect to Forced Labor – Vicarious Liability

On behalf of Plaintiffs against Defendant Shen Yun

170. Plaintiffs incorporate and reallege each and every allegation set forth in the preceding paragraphs as if set forth here in full.

171. As alleged above, Defendant Hongzhi Li knowingly recruited, harbored, transported, provided, and/or obtained Plaintiffs for labor or services in violation of the TVPRA. 18 U.S.C. § 1590(a).

172. At all relevant times, Hongzhi Li was Shen Yun's director, leader, employee, representative, and/or agent.

173. At all times, Hongzhi Li was acting in support of Shen Yun's money-making activities such as its worldwide touring dance performances.

174. At all times, Hongzhi Li sought to further Shen Yun's business interests.

175. Prior to recruiting, harboring, transporting, providing and/or obtaining Plaintiffs' forced labor, Hongzhi Li had performed these acts with similarly situated children. Accordingly, his behavior was entirely foreseeable by Shen Yun.

176. Hongzhi Li's acts in obtaining and/or providing Plaintiffs' labor were within the context of his role as leader, director, employee, representative, and/or agent of Shen Yun.

177. Accordingly, Shen Yun should be held vicariously liable for Hongzhi Li's actions under 18 U.S.C. §§ 1590 and 1595.

178. Plaintiffs suffered damages as a result of Hongzhi Li's conduct, for which Shen Yun is vicariously liable.

179. Plaintiffs are entitled to compensatory and punitive damages, and restitution in amounts to be determined at trial, together with injunctive relief, reasonable attorneys' fees and the costs of this action, and any other relief deemed appropriate.

COUNT VI

Violation of TVPRA 18 U.S.C. §§ 1590 and 1595 – Trafficking With Respect to Forced Labor – Beneficiary Liability

On behalf of Plaintiffs against Defendants Shen Yun, Academy, Dragon Springs, Hongzhi Li, and Rui Lee; on behalf of Plaintiff Sun against Defendant College

180. Plaintiffs incorporate and reallege each and every allegation set forth in the preceding paragraphs as if set forth here in full.

181. Defendants knowingly benefited from participation in a venture which they know or should have known engaged in trafficking with respect to forced labor in violation of the TVPRA. 18 U.S.C. § 1595.

182. Defendants financially benefited, *inter alia*, because by using underpaid forced labor to put on their shows, they saved the money they would have had to use paying fair wages and taxes. As a result of the forced labor venture and their participation in it, Defendants were able to pocket a significant portion of the ticket sales from their worldwide tours.

183. Plaintiffs suffered damages as a result of the conduct of Defendants Shen Yun, Academy, Dragon Springs, Hongzhi Li, and Rui Lee.

184. Plaintiff Sun additionally suffered damages as a result of the conduct of Defendant College.

185. Plaintiffs are entitled to compensatory and punitive damages, and restitution in amounts to be determined at trial, together with injunctive relief, reasonable attorneys' fees and the costs of this action, and any other relief deemed appropriate.

COUNT VII

Violation of TVPRA 18 U.S.C. §§ 1589, 1590, 1594(a) and 1595 – Attempted Forced Labor and Trafficking

On behalf of Plaintiffs against Defendants Shen Yun, Academy, Dragon Springs, Hongzhi Li, and Rui Lee; on behalf of Plaintiff Sun against Defendant College

186. Plaintiffs incorporate and reallege each and every allegation set forth in the preceding paragraphs as if set forth here in full.

187. While, as alleged above, Defendants violated 18 U.S.C. §§ 1589 and 1590, in the alternative, they are liable because they attempted to violate 18 U.S.C. §§ 1589 and 1590. 18 U.S.C. §§ 1594(a) and 1595.

188. Defendants intended to violate, and took the necessary substantial steps to commit the offenses outlined in, 18 U.S.C. §§ 1589 and 1590, or to benefit therefrom.

189. Plaintiffs suffered damages as a result of the conduct of Defendants Shen Yun, Academy, Dragon Springs, Hongzhi Li, and Rui Lee.

190. Plaintiff Sun additionally suffered damages as a result of the conduct of Defendant College.

191. Plaintiffs are entitled to compensatory and punitive damages and restitution in amounts to be determined at trial, together with preliminary and permanent injunctive relief and reasonable attorneys' fees and the costs of this action.

COUNT VIII

Violation of TVPRA 18 U.S.C. §§ 1590 and 1592(a) – Seizure of Documents

On behalf of Plaintiffs against Defendants Shen Yun and Academy

192. Plaintiffs incorporate and reallege each and every allegation set forth in the preceding paragraphs as if set forth here in full.

193. Defendants Shen Yun and Academy knowingly confiscated or possessed Plaintiffs' passports and immigration documents in the course of violating 18 U.S.C. §§ 1589 and 1590, in violation of 18 U.S.C. §§ 1592, 1595.

194. Plaintiffs suffered damages as a result of Defendants Shen Yun and Academy's conduct.

195. Plaintiffs are entitled to compensatory and punitive damages and restitution in amounts to be determined at trial, together with preliminary and permanent injunctive relief and reasonable attorneys' fees and the costs of this action.

COUNT IX

Violation of TVPRA 18 U.S.C. §§ 1589, 1590, 1592, 1594, and 1595 – Conspiracy to Recruit, Obtain, Provide, Transport & Harbor With Respect To Forced Labor

On behalf of Plaintiffs against Defendants Shen Yun, Academy, Dragon Springs, Hongzhi Li, and Rui Lee; on behalf of Plaintiff Sun against Defendant College

196. Plaintiffs incorporate and reallege each and every allegation set forth in the preceding paragraphs as if set forth here in full.

197. It is a violation of the TVPRA to “conspire[] with another” to violate sections 18 U.S.C. §§ 1589, 1590, and 1592 of the TVPRA. 18 U.S.C. § 1594(b).

198. Defendants conspired by agreeing to recruit, harbor, and/or transport Plaintiffs to the Academy and Shen Yun and to provide and/or obtain their forced labor through force, threats of force, physical restraint and/or threats of physical restraint; serious harm and/or through threats of serious harm; and/or through a scheme, plan, or pattern to make Plaintiffs believe they would suffer serious harm if they did not perform their labor. They also conspired to confiscating Plaintiffs’ passports and immigration documents in service of the forced labor scheme.

199. Defendants entered into this joint enterprise and were aware of its general nature and extent.

200. Defendants worked together to ensure that the joint enterprise worked to their knowing financial benefit.

201. Defendants conspired to benefit from the Plaintiffs’ forced labor by ensuring they were not appropriately paid for their work.

202. Plaintiffs suffered damages as a result of Defendant Shen Yun, Academy, Dragon Springs, Hongzhi Li, and Rui Lee’s conduct.

203. Plaintiff Sun additionally suffered damages as a result of the conduct of Defendant College.

204. Plaintiffs are entitled to compensatory and punitive damages and restitution in amounts to be determined at trial, together with preliminary and permanent injunctive relief and reasonable attorneys' fees and the costs of this action.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for relief as follows:

- (a) Declaring that all Defendants committed violations of the TVPRA;
- (b) Preliminary and permanent injunctive relief requiring Defendants to cease violations of the TVPRA and prohibiting violations in the future;
- (c) Awarding damages as provided by the TVPRA, including punitive damages;
- (d) Awarding restitution as provided by the TVPRA;
- (e) Awarding reasonable attorneys' fees and costs as provided by the TVPRA; and
- (f) Granting further relief, in law or equity, as this Court may deem appropriate and just.

DEMAND FOR A JURY TRIAL

Plaintiffs, pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, demand a trial by jury.

Dated: July 28, 2025

Respectfully submitted,



John F.O. McAllister
Carol Merchasin – *pro hac vice forthcoming*
Matthew Paluch
Pamela Takefman

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